REMARKS

Applicants thank Examiner for the thorough consideration given to the claims in the present application. Claims 7 – 23 are cancelled in the present application. Claims 24 - 26 are pending in the present application. Claims 24 - 26 are independent claims. Claim 26 is new.

Amendments to the Specification

Applicants respectfully submit that the amendments to the specification are made purely for the sake of clarity so that the Abstract and "Disclosure of the Invention" (i.e. the summary) portions of the Specification are now consistent with the presently pending claims. No new matter is added to the "Disclosure of the Invention" or the Abstract by these amendments. Applicants respectfully submit that the "Best mode for carrying out the invention" (i.e. the detailed description) fully discusses and discloses the embodiments now summarized in the "Disclosure of the Invention" and the Abstract portions of the Specification.

Rejections under 35 U.S.C. § 102 - Suzuki

Claims 24 and 24 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,481,553 to Suzuki (hereafter "Suzuki"). Insofar as they pertain to the presently pending claims, these rejections are respectfully traversed.

Claim 24

Claim 24 pertains to a moving picture prediction system that comprises, in pertinent part, "a memory update unit that updates the picture data stored in at least one of the plurality of memories in the reference picture memory area, and controls the capacity of the reference picture memory area"

Suzuki teaches a plurality of memory groups (Fig. 6, 2 and 4), the access of which is controlled by a memory control unit (Fig 6, 3) to select, from the first memory group, a reference

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picture and match it against a potential matching block from the second memory group (Col. 18, lines 36 – 63). After matching and reconstruction, a reconstructed picture based on a matched matching block is stored in the second memory group (Col. 19, lines 1 – 11).

Independent claim 24 is directed to controlling "the capacity of the reference picture memory area." Although Suzuki may teach changing the amount of stored prediction reference data contained in one or all of the memory groups, Suzuki does not address or otherwise directly address the question of actual memory capacity. Applicants respectfully submit that the memory capacity is conceptually separate from the amount actually stored in memory.

Applicants respectfully submit that Suzuki is completely silent regarding any control over the capacity of a reference picture memory area. Applicants respectfully submit that although Suzuki discusses a memory control unit that selects data from a memory group (Col. 18, lines 36 – 63), Suzuki does not teach, suggest, or otherwise discuss any capability of the memory control unit (or any other component) to control "the capacity of the reference picture memory area" as required by claim 24.

Claim 25

Claim 25 pertains to a method for predicting a moving picture that comprises, in pertinent part, "controlling the capacity of the reference picture memory area."

Applicants respectfully submit that for at least the same reasons as stated with respect to claim 24, Suzuki is deficient in its teachings with respect to claim 25. Applicants respectfully submit that the concept of "controlling the capacity of the reference picture memory area" as required by independent claim 25 is wholly missing from the teachings of Suzuki.

Summary

At least in view of the above, Applicants respectfully submit that Suzuki is deficient in its teachings with respect to independent claims 24 and 25. Specifically, Applicants respectfully

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submit that Suzuki fails to teach or suggest "[controlling] the capacity of the reference picture memory area" as required by independent claims 24 and 25.

<u>Rejections under 35 U.S.C. § 102 - Boon</u>

Claims 24 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 5,767,911 to Boon (hereafter "Boon"). Insofar as they pertain to the presently pending claims, these rejections are respectfully traversed.

Claim 24

Boon teaches a system and method for mitigating the accumulation of prediction error over time. (Col. 2, lines 40-45). Boon uses a first frame memory (Fig. 1, 342) for storing template images and a second frame memory (Fig. 1, 340) for storing previously processed images. These images are used for the prediction of input signals.

Applicants respectfully submit that although Boon does disclose a plurality of memories, Boon does not teach or suggest "a memory update unit that updates the picture data stored in at least one of the plurality of memories in the reference picture memory area, and controls the capacity of the reference picture memory area" as required by independent claim 24. Boon specifically teaches two, separate, frame memories are used for predictive image generation (Col. 5, lines 25 – 43), but Boon makes no teaching or suggestion that these two frame memories are "allocated in a reference picture memory area" or that there is "a memory update unit that ... controls the capacity of the reference picture memory area."

Applicants respectfully submit that memory capacity is conceptually separate and different from memory content. Boon teaches updating and managing memory content, but fails to teach or suggest any device or apparatus that "controls the capacity of a reference picture memory area" as required by claim 24.

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Claim 25

Applicants respectfully submit that for at least the same reasons as stated with respect to claim 24, Boon is deficient in its teachings with respect to claim 25. Applicants respectfully submit that the concept of "controlling the capacity of the reference picture memory area" as required by independent claim 25 is wholly missing from the teachings of Boon.

Summary

At least in view of the above, Applicants respectfully submit that Boon is deficient in its teachings with respect to independent claims 24 and 25. Specifically, Applicants respectfully submit that Boon does not teach or suggest "[controlling] the capacity of the reference picture memory area" as required by independent claims 24 and 25.

New Claim

Applicants respectfully submit that new claim 26 is allowable for at least the same reasons at set forth with respect to independent claims 24 and 25.

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Conclusion

In view of the above remarks, it is believed that claims are allowable.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Naphtali Y. Matlis, Reg. No. 61,592 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

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